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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CHRISTOPHER HARRY GOODING,

15 Defendant.
16

Case No. 2:16-CR-00136-APG-BNW

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Jessica Oliva, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Aden Kebede,
20 Assistant Federal Public Defender, counsel for Christopher Gooding, that this Court amend the
21 conditions of release.

22 This Stipulation is entered into for the following reasons:

23 1. On January 6, 2023, the Defendant, Christopher Gooding appeared before
24 Magistrate Judge Brenda Weksler for an initial appearance on a supervised release violation
25 and bail hearing. He was released on his personal recognizance with previously imposed
26 conditions of supervised release and some addition conditions. One of the additional conditions
of his release is that Mr. Gooding shall have no physical contact with his ex-girlfriend or either

1 of her two sons pending the revocation hearing.¹ Mr. Gooding shares a six-year-old son with
2 his ex-girlfriend.

3 2. Probation recommended this condition in large part due to the law violation
4 alleged in the petition.²

5 3. Defense and Probation currently have an agreement in place to give Mr.
6 Gooding additional time to readjust to supervision after serving five years in state prison.
7 Should Mr. Gooding maintain compliance until the next revocation hearing, the agreement is
8 that the petition will be dismissed.

9 4. Mr. Gooding is currently in compliance and doing well on supervision since his
10 initial appearance. He has obtained two jobs and is in the process of leaving the halfway house
11 and moving in with his sister.

12 5. Additionally, Mr. Gooding is currently petitioning the family court to get
13 visitation rights for his six-year-old son.

14 6. Should the family court grant visitation rights to Mr. Gooding, the parties agree
15 that the no physical contact condition (as it applies to his six-year-old son) should be modified.

16 7. The parties therefore jointly request to modify Mr. Gooding's no physical
17 contact condition say, "The defendant shall have no physical contact with his ex-girlfriend or
18 her older son pending the revocation hearing."

19 DATED this 16th day of March 2023.

20 RENE L. VALLADARES
21 Federal Public Defender

JASON M. FRIERSON
United States Attorney

22 By /s/ Aden Kebede

By /s/ Jessica Oliva

23 ADEN KEBEDE
Assistant Federal Public Defender

JESSICA OLIVA
Assistant United States Attorney

25 ¹ ECF No. 23, p. 6.

26 ² ECF No. 6.

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

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5 Plaintiff,

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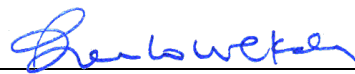
Case No. 2:16-CR-00136-APG-BNW

ORDER

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10 ORDER

11 IT IS HEREBY ORDERED, that this Court amend the conditions of Christopher
12 Gooding's personal recognizance bond as the parties jointly request that Mr. Gooding's no
13 contact condition be modified to allow him to visit his six-year old son if the family court grants
14 his petition for visitation rights. The condition is therefore modified to state, "The defendant
15 shall have no physical contact with his ex-girlfriend or her older son pending the revocation
16 hearing."

17 DATED: March 22, 2023.

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20 UNITED STATES MAGISTRATE JUDGE
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